

**POLLUTION PREVENTION SUBGROUP TELECONFERENCE**  
**FLASH MINUTES**  
May 5, 1998

**ATTENDEES**

Beth Berglund*	Bill Bilkovich	Jan Connery	John deRuyter*
Lachhman Dev*	Chuck Feerick*	Alex Johnson*	Miriam Lev-On*
Bob Morris*	Bill O'Sullivan*	Fred Porter*	Jocelyn Siegel
Chuck Solt*	Jane Williams*	Heather Wright	

\*Pollution Prevention Subgroup members

**DISCUSSIONS AND DECISIONS**

- Fred Porter discussed the Pollution Prevention Subgroup's charter extension granted by the Coordinating Committee (CC) at the April 28 and 29 meeting. The Subgroup's charter has been extended until the July CC meeting, at which time no further extensions will be granted. The CC granted the extension given that the Subgroup would focus their attention on completion of the alternative compliance determinations and pollution prevention (P2) planning documents. In addition, the CC would like the Subgroup to complete the Pollution Prevention Regulatory Options document (fuel/waste constituent standards and fuel/waste de minimis constituent levels) by May 15.
- Fred Porter stated that, from EPA's point of view, the Operator Training recommendations provided a good model in terms of format, style, and level of specificity for the alternative compliance determinations and P2 planning documents (i.e., the documents would be most useful if the Subgroup followed the recommendations as a model).
- Teleconference participants discussed next steps for completion of the alternative compliance determinations document. It was decided that the following individuals will assume authorship roles: Beth Berglund, Miriam Lev-On, Bill O'Sullivan, and John deRuyter (group lead). Several Subgroup members suggested that additional EPA staff members should be involved in reviewing and commenting on the document (i.e., beyond those EPA representatives who have been involved with the Pollution Prevention Subgroup to date), such as permitting, enforcement, and legal staff. John deRuyter suggested that the working group complete a draft in the next 2 to 3 weeks (the group will decide off-line on an exact date). Once a draft is completed, it will be distributed for review and comment by EPA staff (as identified by Fred Porter). The Alternative Compliance Working Group will revise the document based on comments from EPA staff and distribute an updated draft to the entire Pollution Prevention Subgroup for review.
- Teleconference participants also discussed next steps for completion of the P2 planning

document. It was decided that Alex Johnson and representatives from EPA will assume authorship roles. Alex Johnson suggested that the P2 Planning Working Group set a draft completion date for 3 to 4 weeks. Mr. Johnson also suggested that the group use EPA's pollution prevention guidance document as guidance for development of regulatory language. It was also suggested that the National Pollution Prevention Roundtable be contacted for consultation on this topic.

- Teleconference participants discussed scheduling to complete the alternative compliance determinations and P2 planning documents by the July CC meeting. Members suggested that two face-to-face meetings (1½ days in length) be held between now and the July meeting. The first will be held in approximately 4 to 5 weeks (in early or mid-June) to review and discuss the draft work products. A second face-to-face meeting will be scheduled for early or mid-July to finalize the documents prior to the July 17 deadline for posting to the TTN. If necessary, a third and final meeting will be scheduled a few days prior to the July 17 deadline. It was also decided that three conference calls should be scheduled: one prior to the first face-to-face meeting, one prior to the second face-to-face meeting, and one just prior to the July 17 TTN posting (assuming that a face-to-face meeting does not occur). Several Subgroup members stressed the importance of full EPA participation in these meetings.
- Bill O'Sullivan lead a discussion of the draft Pollution Prevention Regulatory Options document, Sections 3.3 (fuel/waste de minimis constituent levels) and 3.4 (fuel/waste constituent standards). Mr. O'Sullivan mentioned that the example paragraph in Section 3.3 is new language and asked that members review it and forward comments to him. He also asked for input on whether the de minimis draft should be modified to indicate that a de minimis level can be applied not only to fuel constituent limits, but also to existing end-of-pipe emissions limits. Subgroup members asked that he draft a paragraph concerning this concept for review by the Subgroup and possible insertion into the document. However, members agreed that if this concept proves controversial, it would not included in the final document. During the call, Subgroup members also asked that minor changes be made to the language in both Sections 3.3 and 3.4. Mr. O'Sullivan asked that Subgroup members forward any additional changes or comments to him after the call no later than COB Thursday, May 7. He will incorporate comments and send a revised draft to all Subgroup members for review on Friday, May 8. A teleconference will be scheduled for early the week of May 11 to finalize these drafts for posting to the TTN by May 15.
- Teleconference participants briefly considered whether the Operator Training recommendations presented at the April CC meeting would need to be modified in light of the fact that the CC plans to discuss whether to forward the document to EPA for consideration in other rulemaking efforts at the July CC meeting. Several members believe that the Subgroup does not need to revise the paper before the July meeting. But teleconference participants decided that the Subgroup would revisit the need to revise the Operator Training recommendations after progress has been made on finalizing the

alternative compliance determinations and P2 planning documents.

### **ACTION ITEMS**

- Subgroup members are to complete review of the Pollution Prevention Regulatory Options document, Sections 3.3 (fuel/waste de minimis constituent levels) and 3.4 (fuel/waste constituent standards) and forward any additional comments to Bill O'Sullivan by May 7.
- Mr. O'Sullivan will draft a paragraph on the concept of a de minimis level that can be applied not only to fuel constituent limits but also to existing end-of-pipe emissions limits.
- Mr. O'Sullivan will distribute revised drafts of Sections 3.3 and 3.4 (incorporating comments received by May 7) to the Subgroup on May 8 for review and comment.
- Jan Connery will determine a date and time for a teleconference the week of May 11 to discuss and finalize the Pollution Prevention Regulatory Options document (Sections 3.3 and 3.4) for posting to the TTN by May 15.
- Bill O'Sullivan will distribute New Jersey's Title V language to Subgroup members to use as a reference for developing the regulatory language for alternative emission limits.
- Fred Porter will identify EPA staff who will review the draft alternative compliance determinations paper.
- All Subgroup members and participants should send Jan Connery their work schedules from May 11 through July 17 ASAP, indicating which days they are available for full-day, face-to-face meetings, and which times they are available for conference calls.
- Jan Connery, working with Fred Porter, will determine the most suitable dates and locations for the upcoming meetings and teleconferences.

### **NEXT MEETINGS**

- A teleconference will be scheduled for the week of May 11 to finalize the Pollution Prevention Regulatory Options document (fuel/waste constituent standards and fuel/waste de minimis constituent levels).
- At least two face-to-face meetings and three conference calls will be scheduled before the July CC meeting to finalize the alternative compliance determinations and P2 planning documents.